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**From:** Wolf, Kristen [kwolf@pa.gov]  
**Sent:** 6/29/2018 12:26:11 PM  
**To:** Trevena, Suzanne [Trevena.suzanne@epa.gov]  
**CC:** Kasi, Veronica [vbkasi@pa.gov]  
**Subject:** RE: Revised Milestone bullets

Thanks for your responses Suzanne—the highlights came through.

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**From:** Trevena, Suzanne [mailto:Trevena.suzanne@epa.gov]  
**Sent:** Thursday, June 28, 2018 4:43 PM  
**To:** Wolf, Kristen <kwolf@pa.gov>  
**Cc:** Kasi, Veronica <vbkasi@pa.gov>  
**Subject:** RE: Revised Milestone bullets

I highlighted my responses since the bulleting wasn't showing up right. Hopefully the yellow comes through.

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**From:** Wolf, Kristen [mailto:kwolf@pa.gov]  
**Sent:** Thursday, June 28, 2018 3:31 PM  
**To:** Trevena, Suzanne <Trevena.suzanne@epa.gov>  
**Cc:** Kasi, Veronica <vbkasi@pa.gov>  
**Subject:** RE: Revised Milestone bullets

Hi Suzanne—thanks for the early feedback on your milestone changes based on our 2<sup>nd</sup> milestone draft. I think, between our two organizations, we covered most the bases. A few quick questions below for my clarification...

- 16-17 Ag Milestones Missed section: Are you moving the stream bank fencing bullet under this section to 18-19 Ag Areas to Address section, given the update provided in the latest version of the milestones that includes updates on the NFWF grant?  
Kept it in because I think we agreed on the call it was a miss, but it was rewritten to say : Progress related to achieving the increase to the PADEP Stream Bank fencing program was not reported. This work was carried forward into the 2018-2019 milestones to implement projects including streambank fencing.
- 18-19 Ag Areas to Address section:
  - Did you remove the bullet re: PA identifying a dedicated funding source, etc.?  
No but did clarify that it is a phase 3 WIP expectation and not an 18-19 milestone expectation. Currently this is the only “Ag need” still listed.
  - Were you able to remove “...and ultimate implementation...” from the bullet re: regional manure transport, per our group convo?  
I deleted the entire bullet.
- Under the 18-19 SW Areas to Address:
  - Were you able to remove the 1<sup>st</sup> bullet about addressing the gap in the WIP, as we discussed?  
No. From our follow up call that bullet is still there but specifically says to address in the Ph 3 WIP.
  - Find out from Liz if PA corrected the remaining program deficiencies in the PA SW Program Reassessment? Sean thought it was completed and should be removed, but you wanted to check with Liz and others on that one.

That was the list from the 106 Clean Water Action Plan. I thought only 1 item was completed. We'll let them hash out through 106 what remains to be completed. I didn't add the specific list to the eval. But I will also recheck with the stormwater folks to see if the whole list is completed or if there are remaining items since this is coming up here and will come up for 106. If the whole list is completed then I will remove that bullet.

- Not sure that the proposed fertilizer bullet below really answers the question posed on our call with EPA of how EPA expects that to occur? I believe there was going to be more specific on that one.

I was told that Ted knows what is being asked of PA/that bullet. We tried to get more specific and in the end it reverted back to what you saw today. The BMP panel report says the fertilizer sales data is the most current or accurate way to report Urban nutrient management and so that is why EPA is asking all states to track that data if at all possible for reporting that BMP. Maybe Ted can shed some light, I don't know if that means that PA doesn't get credit for the BMP without the fertilizer data or if it means using old, outdated data. This is in all evals, not just PA.

- Nicki, are you OK with the sector growth milestone bullet EPA re-wrote below?

The language was modified to mirror the Phase 3 WIP Expectations better (and hope to be more clear). The ultimate goal is that by using 2025 projections growth is addressed in your WIP, but if there is some unexpected growth explosion somewhere then it's recognition that we'll find out through the milestones when model data is updated every 2 years and then we'll ask states to readjust to account for that growth, as necessary.

Thanks!

Kristen

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**From:** Trevena, Suzanne [<mailto:Trevena.suzanne@epa.gov>]

**Sent:** Thursday, June 28, 2018 2:47 PM

**To:** Wolf, Kristen <[kwolf@pa.gov](mailto:kwolf@pa.gov)>

**Subject:** Revised Milestone bullets

Kristen,

Here is the proposed revision to the fertilizer bullet:

- EPA recommends Pennsylvania to include a milestone for improving documentation and reporting of fertilizer sales data to track future fertilizer application rates.

I was told that Ted is aware of the partnership agreement or the BMP panel report which recommended this approach for progress crediting. We changed this to recommends from expects. There were a few versions of this and I know in the end it didn't change much, but hopefully it being a "recommend" helps.

Also, here is how the sector growth bullet was rewritten (for all states):

- The CBP partnership agreed to develop 2025 growth projections for jurisdictions to use in developing their Phase III WIPs. EPA will provide growth projections to Pennsylvania by sector and basin based on Pennsylvania's data. EPA expects Pennsylvania to account for and describe how it will offset any sector language to basin growth in its Phase III WIP (e.g., programs, regulations, etc.). Growth projections will be updated every two years and EPA expects Pennsylvania to address any projected growth in its 2-year milestones. In particular, EPA expects Pennsylvania to continue to monitor and quantify any increases in agricultural loads and to take appropriate steps to offset any increases in resulting pollutant loads, as necessary.

I deleted most of the bullets in the Ag "Needs" section based on the revised milestones and I proposed the following additions to the 18-19 strengths. I am still waiting to hear back from folks if

they are OK with my proposed revisions, but here is what I've added so far (subject to change based on EPA Ag feedback):

- Pennsylvania committed to initiate implementation of the Pennsylvania Agriculture Conservation Stewardship program.
- Pennsylvania committed to initiate a pilot to assess implementation of state-required plans as part of the Agricultural Compliance Inspection program.
- Pennsylvania met the commitment to reissue the Pennsylvania General Permit (PAG)-12 for Concentrated Animal Feeding Operations (CAFOs) by April 2018.

Let me know if any of this gives you major concern (by next Monday or Tuesday – if you're in) and I'll try to negotiate language before the "fatal flaw" version goes out to PA.

Thanks so much,

Suzanne